enforced unless the particular form of the will evidently depended upon the condition. *Davis* v. *Davis*, *supra*. Courts do not favor conditional wills and will seize upon such circumstances as the permanence and naturalness of the bequests or the general inaccuracy of the testator's language to construe away a condition. *Eaton* v. *Brown*, 193 U. S. 411. And in case of doubt courts prefer to construe the statement of contingency as expressing only the occasion for making the will at that particular time. *Forquer's Estate*, 216 Pa. 331, 66 Atl. 93; *In the Goods of Dobson*, L. R. 1 P. & D. 88. In accordance with these principles, the decision in the principal case seems to be a correct interpretation of the testator's intention.

WILLS — CONSTRUCTION — ERRONEOUS DESCRIPTION OF LAND. — A testator directed his executors to sell the northeast quarter of the northeast quarter of section 3, township 92, range 44. The testator never owned the northeast quarter of the northeast quarter but owned the northwest quarter of the northwest quarter of the designated section, township, and range. The executor before discovering the error in the will contracted to convey the northwest quarter of the northwest quarter to the plaintiff, who now seeks specific performance. *Held*, that a decree will issue. *Wilmes* v. *Tiernay*, 174 N. W. 271 (Iowa).

For a discussion of this case, see NOTES, p. 467, *supra*.

BOOK REVIEWS

THE NEGOTIABLE INSTRUMENTS LAW ANNOTATED. By Joseph Doddridge Brannan. Third Edition. Cincinnati: The W. H. Anderson Company. 1919. pp. iii, 622.

This very handy reference volume comes to us in a third edition, brought down to date. What that signifies in a general way is indicated by the 622 pages of this edition as compared with the 250 pages of the first edition published in 1908. At that time thirty-four states and territories had adopted the Act, which to-day is in force in all of continental United States except Georgia, but including Alaska, besides Hawaii and the Philippine Islands. Apparently the only portions of our territory outside of Georgia in which it is not now effective are Porto Rico, the Canal Zone, Guam, and the Virgin Islands. This wider currency of the law, together with the lapse of time in all jurisdictions — the first edition was published eleven years ago — has of course vastly increased the number of adjudications. A rough calculation shows approximately 2360 entries in the table of cases as against about 600 in the first edition. All of these that are of sufficient significance to justify it are stated in substance and commented on where needful. A useful feature, too often overlooked in books of this sort, is a statement in the preface of the precise point in the various Reports to which the author has carried his researches.

The greatly increased size of the volume when compared with its humble beginnings is not due entirely, however, to the increase in adjudications reviewed. It is largely accounted for by the use of larger type and liberal spacing. Typographically the body of the book is excellent, — it is good to look upon, — though the somewhat crowded title-page can scarcely be said to be a work of art.

The volume contains, besides the law itself and all the adjudications upon it, section by section, all the useful auxiliary apparatus contained in the earlier editions, such as cross-references to the Bills of Exchange Act and tables of

corresponding sections with their numbering in the various state statutes and compilations. In future editions, when still more space will be required for the ever increasing adjudications, nearly a hundred and fifty pages can be saved by omitting the controversy over its adoption waged by Ames, Brewster, and McKeehan. This matter, excellent though it is, is of diminishing importance now, is abundantly accessible elsewhere, and would seem not to be strictly germane to the purpose of the book, which is, we suppose, to keep the profession up to date as to the status of this important statute before the courts. The author states in his preface that it is only "after much consideration and consultation with others" that he decided to retain these articles. It seems to the reviewer that it would not have been a serious mistake to omit them. Nowadays Punch's advice to those about to marry is equally applicable to those about to insert any unnecessary matter in a law book.

A table of the states in which variations or additions have been engrafted on the law shows instructively what difficulties in the way of pride of opinion confront the uniformitarians in law reform. Of fifty-two jurisdictions in which the law has been adopted, thirty-five have made some variations or engrafted some additions on the law as proposed. Not many of them, however, reach the bad preëminence of Illinois and Wisconsin with their thirty-one and twenty-five changes respectively, though Kentucky, North Carolina, and South Dakota each has more than ten. But many more have only one or two, and those not important, so that the efforts at uniformity have been crowned with at least a large measure of success.

In a word, this book, now brought down to date, will be found very useful; and that is all it aims to be.

HOWARD L. SMITH.
UNIVERSITY OF WISCONSIN.

LEAGUE OF NATIONS: ITS PRINCIPLES EXAMINED. Volume II. By Theodore Marburg. New York: The Macmillan Company. 1919. pp. 149.

A SOCIETY OF STATES: SOVEREIGNTY, INDEPENDENCE, AND EQUALITY IN A LEAGUE OF NATIONS. By W. T. S. Stallybrass. New York: E. P. Dutton and Company. 1919. pp. xviii, 243.

Dissatisfaction with the treaty of peace, the unrestrained garrulity of the United States Senate, and the acuteness of labor problems have resulted in disillusionment and indifference with respect to the League of Nations. Yet the League, in President Wilson's phrase, must be made "a vehicle of life"; only through it can the world achieve a solution of the difficult problems that the Peace Conference failed to deal with, and only the unsatisfactory security which it grants will permit the cost of armaments to be reduced so that the world may avoid bankruptcy and, by measures of social amelioration, prevent great revolutions. If the recent conflict sowed so many seeds of industrial revolt, the present order will be completely unable to survive another great war.

These truths have as yet been inadequately realized in the United States. There has been practically no real discussion of the proposal, no great debate as to its feasibility, advisability, and the inconvenience that it would cause. Few have realized the importance of the third great decision that the United States was called upon to make: *The Covenanter*, by President Lowell, the Tafts, and Mr. Wickersham, was published and was a worthy successor to *The Federalist*, but it was late and only served to show what was necessary. For no great, new ideal — especially if it be unsanctioned by historical experience and mean a sacrifice of national or personal liberty of action — can be put into practice unless its advantages and difficulties are fully understood. The urgency was not so immediate and the course proposed more radical than